

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE:	§ CHAPTER 11
	§
MONTICO OFFSHORE, INC., et al.,	§ CASE NO. 17-31646 (MI)
	§
DEBTORS.	§ (Jointly Administered)

**BOLLINGER FOURCHON, LLC’S JOINDER TO OCEANEERING INTERNATIONAL,  
INC.’S MOTION TO ENFORCE PROVISIONS OF CONFIRMED CHAPTER 11 PLAN**  
[Doc. No. 1065]

**THIS MOTION SEEKS ENTRY OF AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.**

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.**

TO THE HONORABLE BANKRUPTCY JUDGE MARVIN ISGUR:

Bollinger Fourchon, LLC (hereinafter “Bollinger”) hereby files this Joinder (“Joinder”) to Oceaneering International, Inc.’s (“Oceaneering”) Motion to Enforce Provisions of Confirmed Chapter 11 Plan (the “Motion”) [Doc. No. 1065]. In support of this Joinder, Bollinger respectfully shows as follows:

On December 26, 2017, Montco Offshore, Inc. filed its Amended Plan of Reorganization (the “Plan”) [Doc. No. 740] that was confirmed by Order dated January 18, 2018 [Doc. No. 784].

1. On May 20, 2020, Oceaneering filed the Motion. *See* Doc. No. 1065.
2. Bollinger adopts and incorporates by reference the facts alleged and relief requested contained within the Motion as if each were set out in full herein.
3. Moreover, Bollinger fully reserves its rights, claims and defenses, including the right to amend, modify or supplement this pleading, to raise objections and introduce evidence at any hearing on the Motion. Moreover, Bollinger reserves all of its rights as a creditor in these bankruptcy cases.

DATED: June 2, 2020

Respectfully submitted,

GORDON, ARATA, MONTGOMERY, BARNETT,  
McCOLLAM, DUPLANTIS & EAGAN, LLC

/s/ Stephen L. Williamson

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**COUNSEL FOR BOLLINGER FOURCHON, LLC**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing Joinder was served via the Court's ECF system on those parties consenting to service through same on June 2, 2020.

/s/ Stephen L. Williamson

Stephen L. Williamson